

EXHIBIT 8

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4

5 -----) MDL No. 2804

6 IN RE NATIONAL PRESCRIPTION)

7 OPIATE LITIGATION)

8) Case No. 17-md-2804

9 This document relates to:)

10 All Cases)

11 -----) Hon Dan A. Polster

12

13 HIGHLY CONFIDENTIAL

14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

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16 The 30(b)(6) videotaped deposition of
17 ALLERGAN by and through MARY WOODS, called for
18 examination, taken pursuant to the Federal Rules of
19 Civil Procedure of the United States District Courts
20 pertaining to the taking of depositions, taken before
21 JULIANA F. ZAJICEK, a Registered Professional Reporter
22 and a Certified Shorthand Reporter, at Liefk Cabraser
23 Heimann & Bernstein, 8th Floor, 250 Hudson Street, New
24 York, New York, on January 9, 2019, at 9:10 a.m.

1 A. Yes.

2 Q. All right.

3 All right. So let's move on to Exhibit
4 No. 8. Could you pick that up inside the compendium
5 Exhibit 25, and look through it, and as you are
6 looking through it, I'll note it is a
7 four-page document, Allergan_MDL_03641386 through
8 1389.

9 When you are ready, can you tell me what
10 this appears to you to be?

11 A. Yes. This is a corporate standard
12 operating procedure. So this is filed with the entire
13 corporation. It is a high-level procedure regarding
14 suspicious orders of controlled drugs.

15 Q. All right. And with regard to this
16 document, you say it's filed with the corporation.

17 What is the difference between this and
18 what we were talking about before, Exhibit 3?

19 A. Sure.

20 The ones under Exhibit 3 -- and the ones
21 that are identified as operational procedure documents
22 are typically a derivative of a corporate standard
23 operating procedure. So the corporate standard
24 operating procedures are actually come -- are -- are